

EXHIBIT C

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

PGX HOLDINGS, INC., *et al.*¹,

Debtors.

Chapter 11

Case No. 23-10718 (CTG)

(Joint Administration Pending)

KIRSTEN HANSEN on behalf of herself and all
others similarly situated,

Plaintiff,

Adv. Proc. No. 23-50396(CTG)

v.

PGX HOLDINGS, INC.; PROGREXION
HOLDINGS, INC.; PROGREXION
TELESERVICES, INC.; PROGREXION
MARKETING, INC.; PROGREXION ASG, INC.;
PROGREXION IP, INC.; EFOLKS, LLC;
CREDITREPAIR.COM, INC.; CREDIT.COM,
INC.; and JOHN C. HEATH, ATTORNEY AT
LAW, PLLC,

Defendants.

NOTICE OF CLASS ACTION

***YOU ARE NOT BEING SUED. PLEASE READ THIS NOTICE CAREFULLY AS IT MAY
AFFECT YOUR RIGHTS.***

TO: All ex-employees of Defendants, who worked at, received assignments from, or reported to one of Defendants' Facilities, and were terminated without cause beginning on April 5, 2023, and within 90 days of that date, in the mass layoffs and/or plant closings ordered by Defendants on or

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney at Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors' service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

about April 5, 2023.

SUBJECT: The claims of a former employee of Defendants alleging that he and other employees were not provided 60 days' advance written notice of their terminations by Defendants, as required by the Worker Adjustment and Retraining Notification Act, 29 U.S.C. § 2101 *et seq.*, (the "WARN Act").

DATE: _____, 2023

THE CLASS CLAIM

Plaintiff worked for Defendants until she, along with other employees, was terminated beginning on April 5, 2023.

On June 4, 2023, PGX Holdings, Inc.; Credit.com, Inc.; Creditrepair.com, Inc.; eFolks, LLC; John C. Heath, Attorney at Law PLLC; Progrexion ASG, Inc.; Progrexion Holdings, Inc.; Progrexion Marketing, Inc.; and Progrexion Teleservices, Inc. ("Defendants") each filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"). The Debtors' cases are being jointly administered under Case No. 23-10405-KBO.

On June 5, 2023, Plaintiff filed an adversary proceeding complaint in this court against Defendants (Adv. Proc. No. 23-50396 (CTG)). In her complaint, Plaintiff seeks damages in the amount of up to 60 days' pay and ERISA benefits due to Defendants' alleged violation of the WARN Acts. Specifically, Plaintiff alleges that on or about April 5, 2023, she and other similarly situated employees were terminated from their employment without 60 days advance written notice of their terminations as required by the WARN Acts. Plaintiff alleges that Defendants terminated her and the other employees unlawfully and are liable to her and other employees for up to 60 days' wages and benefits.

Defendants have filed an answer to the complaint denying any liability under the WARN Act.

THE DEFINITION OF THE CLASS

The Court has recently certified this case as a Class Action. The Class is defined as:

Plaintiff and other similarly situated employees of Defendants: (i) who worked at, received assignments from, or reported to the Facilities, (ii) who were terminated without cause within 90 days of April 5, 2023, or in reasonable anticipation of or as the reasonably foreseeable consequence of the mass layoffs or plant closings ordered by Defendant on or about April 5, 2023, (iii) who are "affected employees" within the meaning of 29 U.S.C. § 2101(a)(5), and (iv) who have not filed a timely request to opt-out of the class.

WHAT TO DO

If you wish to be a member of the class, you do not need to do anything, and you will receive whatever benefits you may be entitled to if you are determined to be eligible as a Class Member.

If you do nothing, you will automatically be a Class Member and be bound by any judgment (whether favorable or unfavorable) or court-approved settlement in the case. Before court approval, you, as a Class Member, will receive notice of any proposed settlement and will be afforded an opportunity to object to the settlement. You may appear by your own counsel if you are a Class Member.

If you do NOT wish to participate in this Action and wish to be EXCLUDED and thereby reserve your rights under the WARN Acts and NOT share in any recovery in the Action, sign the form below and mail it by First Class Mail to Raisner Roupinian LLP, 270 Madison Avenue, Suite 1801, New York, New York 10016, (212) 221-1747, Attn: René S. Roupinian. The form must be received by Ms. Roupinian no later than _____, **2023**. All requests for exclusion received after that date will not be effective, and any person who sends a late request will be a member of the class in the Action and will be bound in the same way and to the same extent as all other Class Members.

CLASS COUNSEL AND CLASS REPRESENTATIVE

The Plaintiff who initiated this lawsuit is represented by Raisner Roupinian LLP, 270 Madison Avenue, Suite 1801, New York, New York 10016, (212) 221-1747. The Court has also recently appointed Kirsten Hansen as the Class Representative and Raisner Roupinian LLP as Class Counsel.

THE COURT HAS NO POSITION ON THE MERITS

The Court has taken no position regarding the merits of the Plaintiff's claims.

ADDITIONAL INFORMATION

If you wish information or assistance, please contact Jenny Hoxha of Raisner Roupinian LLP at (212) 221-1747. ***Please do not call or contact the Court or Defendant's Counsel for information.***

EXCLUSION FORM

Hansen v. PGX Holdings, Inc. et al.
United States Bankruptcy Court for the District of Delaware
Adversary Proceeding No. 23-50396(CTG)

I, the undersigned, have read the foregoing Notice and understand its contents.

I, the undersigned, **do not** want to be part of the Class Action or receive any benefits from the Class Action and do not wish to be bound by the outcome of the Class Action.

Signature

Address

Name (printed or type)

Telephone

Date

If you do NOT wish to be included, send this completed form to:

Raisner Roupinian LLP
270 Madison Avenue, Suite 1801
New York, New York 10016
Attn: René S. Roupinian